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October 26, 2005

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWB-204  
Washington, DC 20554

Re:                In the Matter of Reporting Requirements for U.S. Providers of  
                      International Telecommunications Services, IB Docket No. 04-112

Dear Ms. Dortch:

On October 25, 2005 Jim Talbot and I of AT&T met with Emily Willeford of Chairman Martin's office to discuss issues in this proceeding.

We briefly reviewed AT&T's positions in this docket, which are documented in the attachment. We discussed the significant burdens these reports place on US international carriers, the highly competitive nature of the US international market, and the increased liberalization of foreign markets, and the need, therefore, to remove, or at a minimum, significantly streamline, the current international reports. We discussed several of the proposals included in the NPRM that should be adopted, and several new proposals that would only further burden U.S. carriers. We also listed data that AT&T would be prepared to provide on an annual, global, aggregate basis that would allow the Commission to continue to track trends in international prices and settlement payments, as well as allow for fee assessment.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "D. W. Schoenberger", with a long horizontal flourish extending to the right.

Attachment

Copy to:  
Emily Willeford

**Reporting Requirements for U.S. Providers of International  
Telecommunications Services (IB Docket No. 04-112)  
October 25, 2005**

- ✓ The Commission should eliminate the reporting requirements in sections 43.61 and 43.82.
  - The highly competitive nature of the U.S. market and increased liberalization of foreign markets eliminates the need for these reports.
  - Section 43.61 and 43.82 reports now provide insufficient benefits to justify reporting the huge volume of data on an annual basis. U.S. carriers would be prepared to provide the following streamlined information on a global, annual, aggregate basis:
    - Minutes
    - Revenues
    - Inbound Settlements
    - Outbound Settlements
    - Circuits (64K equivalents)
- ✓ If the Commission retains these reports they should be significantly streamlined, and under no circumstances should international reporting requirements be made more burdensome.
- Several NPRM proposals further the Commission's objective of simplifying international reporting requirements consistent with changes in the international marketplace and should be adopted.
  - Eliminate the current requirement to report number of messages.
  - Eliminate the current requirement to separately report data for off-shore points.
  - Section 43.61 and 43.82 reports should be consolidated into a single report.
- There is near-unanimous agreement among the commenters that proposals for new requirements would be unnecessarily burdensome and require unwarranted changes in reporting systems not commensurate with any regulatory benefit for the competitive international services market. These proposals should not be adopted.
  - Separately reporting retail and wholesale information.
  - Reporting non-route specific revenues.
  - Separate reporting for US carrier country direct/country-beyond services.
  - Separate reporting to divide IMTS traffic between "traditional settlements" and "other" categories.

- The NPRM seeks comment on other potential changes to the reporting requirements.
  - Quarterly traffic and revenue reports for large carriers should be eliminated. (43.61(b))
  - Quarterly reports by switched resale carriers affiliated with dominant carriers should be removed.(43.61(c))
  - Reporting requirements for CMRS providers offering international services via resale should be eliminated. (43.61(a))
  - Carrier-specific circuit status data is competitively sensitive and properly treated as confidential.
- ✓ This docket provides an excellent opportunity for the Commission to modify its reporting requirements to reflect the changes in the international services marketplace. However, the Commission should carefully weigh the benefits of adopting any proposals that require greater and unprecedented detail against the significant burden in terms of staffing and financial resources required by U.S. carriers to gather and analyze the requested data.